

Exhibit 2

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**CHILLY DIL CONSULTING INC., a
Florida corporation,**

Plaintiff,

V.

CIVIL ACTION NO. 3:14-cv-02749-N

JETPAY ISO SERVICES, LLC, a Texas limited liability company; JETPAY, LLC, a Texas limited liability company; JETPAY CORPORATION, a Delaware corporation; and TRENT R. VOIGT, an individual,

Defendants.

DECLARATION OF ELIZABETH L. McDOUGALL

PURSUANT TO 28 U.S.C. § 1746, I, ELIZABETH L. McDOUGALL, DECLARE THE FOLLOWING:

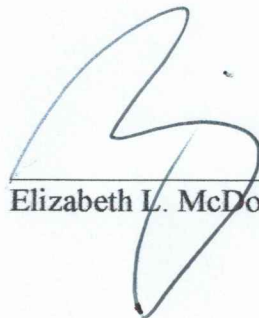
1. I have personal knowledge of the facts stated and business records referenced or relied upon herein.
2. I am the General Counsel for Backpage.com, LLC (“Backpage.com”).
3. In my capacity as General Counsel, I have knowledge of the subpoena issued by Chilly Dil Consulting Inc. (“Chilly Dil”), dated December 11, 2015 (the “Subpoena”), as well as Backpage.com’s compliance efforts, production of documents, and communications with outside counsel for Chilly Dil.
4. I also have personal knowledge and experience, based upon my role and responsibilities as Backpage.com’s General Counsel for managing Backpage.com’s litigation, of the efforts and costs involved in large scale data and document searches, collection, review and production. For example, in a recent case, an initial data set retrieved from company sources

(servers, cloud storage, etc.) was one (1) terabyte in size. The cost for an outside vendor to process (meaning load the data into a program that would allow for searches for potentially responsive information and documents) was approximately \$83,000. The estimated size of the data set called for by the Subpoena is 15 terabytes. Consequently, the processing cost alone for this data set would likely be over \$1,000,000. Further, once the raw data has been processed and targeted term-based searches have been applied, the remaining information and documents must be manually reviewed for genuine responsiveness as well as confidentiality and privilege assertions. Because many terms in the Subpoena are broad, vague or generic, the volume of information and documents for manual review is likely to be very high, potentially over 50 million documents or 2.6 billion pages according to our Information Systems Manager. In the same recent case, review of approximately 100,000 documents took approximately 1,550 hours and cost nearly \$300,000.

5. Consequently, it is my best estimate compliance with the Subpoena could cost Backpage.com well into the millions of dollars.

6. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 7, 2016.



Elizabeth L. McDougall